

# COHEN & GREEN

January 17, 2025

Honorable Andrew L. Carter, Jr., U.S.D.J.  
United States District Court, Southern District of New York  
500 Pearl Street  
New York, NY 10007-1312

By Electronic Filing with Email Copy (Per the Court's Rules).

**Re: Phillips v. City of New York, 21-CV-8149 (ALC)(SLC)**

Dear Judge Carter:

My firm, with co-counsel represents Plaintiffs and the putative class in the case above. I write, with Defendants' consent, to ask for a 30 day extension to oppose the pending motion to dismiss.<sup>1</sup> With the extension, the new deadline will be Monday, February 23, 2025. Plaintiffs ask for this extension in an abundance of caution (*see* n. 1, below), but will still attempt to meet the current deadline.

Per the Court's rules: (1) the original deadline for Plaintiffs' opposition was November 11, 2024, (2) there were three prior requests, (3) those requests were granted, and (4) Defendants consent. This request will not alter any other deadline, so no proposed Revised Scheduling Order is attached.

As always, we thank the Court for its continued time and attention.

Respectfully submitted,

/s/

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J. Remy Green

*Honorific/Pronouns: Mx., they/ their/ them*

**COHEN & GREEN P.L.L.C.**

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cc:

All relevant parties by electronic filing.

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<sup>1</sup> With apologies again, I was perhaps over-optimistic in the last request. I have a surgery that was supposed to be scheduled later, but was ultimately scheduled to January 24<sup>th</sup> — the current filing deadline — and requires travel and preparation that knocks out some of the rest of that week. Additionally, Plaintiffs seek 30 days here to bake in some recovery time.